

1 BOIES SCHILLER FLEXNER LLP
2 Mark C. Mao (CA Bar No. 236165)
3 mmao@bsflp.com
4 44 Montgomery Street, 41st Floor
5 San Francisco, CA 94104
6 Telephone: (415) 293 6858
7 Facsimile: (415) 999 9695

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Andrew H. Schapiro (*pro hac vice*)
andrewschapiro@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

5 SUSMAN GODFREY L.L.P.
6 William Christopher Carmody (pro hac vice)
7 bcarmody@susmangodfrey.com
8 Shawn J. Rabin (pro hac vice)
srabin@susmangodfrey.com
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Telephone: (212) 336-8330

Stephen A. Broome (CA Bar No. 314605)
stephenbroome@quinnemanuel.com
Viola Trebicka (CA Bar No. 269526)
violatrebicka@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

10 MORGAN & MORGAN
John A. Yanchunis (pro hac vice)
jyanchunis@forthepeople.com
11 Ryan J. McGee (pro hac vice)
rmcgee@forthepeople.com
12 201 N. Franklin Street, 7th Floor
Tampa, FL 33602
13 Telephone: (813) 223-5505

Jomaire A. Crawford (admitted *pro hac vice*)
jomairecrawford@quinnmanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

14 *Attorneys for Plaintiffs; additional counsel
listed in signature blocks below*

Attorneys for Defendant; additional counsel listed in signature blocks below

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

20 CHASOM BROWN, WILLIAM BYATT,
21 JEREMY DAVIS, CHRISTOPHER
22 CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Case No. 4:20-cv-03664-YGR-SVK

**JOINT [PROPOSED] DEPOSITION
SCHEDULE IN RESPONSE TO
DECEMBER 12, 2022 ORDER (DKT. 803)**

Judge: Hon. Yvonne Gonzalez Rogers

23 | Plaintiffs

V.

25 || GOOGLE LLC,

Defendant.

1 Pursuant to Your Honor's December 12, 2022 Order (Dkt. 803) regarding scheduling the
 2 depositions of Glenn Berntson, Steve Ganem, George Levitte, and Jonathan McPhie "on the topics
 3 contained in their declarations to the extent relevant," Dkt. 803 at 11 n.5, Plaintiffs and Defendant
 4 Google LLC ("Google") jointly submit the following proposed schedule:

5 Event	6 Proposed Date
7 Last Day for Depositions	8 February 17, 2023

9 The parties plan to provide a joint proposal regarding the summary judgment schedule in the
 10 January 23, 2023 joint scheduling statement. *See* Dkt. 803 at 34.

11 DATED: December 19, 2022

12 QUINN EMANUEL URQUHART &
 13 SULLIVAN, LLP

14 /s/ Andrew H. Schapiro
 15 Andrew H. Schapiro (admitted *pro hac vice*)
 andrewschapiro@quinnemanuel.com
 16 Joseph Margolies (admitted *pro hac vice*)
 josephmargolies@quinnemanuel.com
 Teuta Fani (admitted *pro hac vice*)
 17 teutafani@quinnemanuel.com
 18 191 N. Wacker Drive, Suite 2700
 Chicago, IL 60606
 Tel: (312) 705-7400
 Fax: (312) 705-7401

19 Diane M. Doolittle (CA Bar No. 142046)
 dianedoolittle@quinnemanuel.com
 20 Sara Jenkins (CA Bar No. 230097)
 sarajenkins@quinnemanuel.com
 21 555 Twin Dolphin Drive, 5th Floor
 Redwood Shores, CA 94065
 Telephone: (650) 801-5000
 22 Facsimile: (650) 801-5100

23 Stephen A. Broome (CA Bar No. 314605)
 stephenbroome@quinnemanuel.com
 24 Viola Trebicka (CA Bar No. 269526)
 violatrebicka@quinnemanuel.com
 25 Crystal Nix-Hines (CA Bar No. 326971)
 crystallnixhines@quinnemanuel.com
 26 Alyssa G. Olson (CA Bar No. 305705)
 alyolson@quinnemanuel.com
 27 Marie Hayrapetian (CA Bar No. 315797)

28 BOIES SCHILLER FLEXNER LLP

/s/ James W. Lee
 James W. Lee (*pro hac vice*)
 jlee@bsflp.com
 Rossana Baeza (*pro hac vice*)
 rbaeza@bsflp.com
 100 SE 2nd Street, Suite 2800
 Miami, FL 33130
 Tel: (305) 539-8400
 Fax: (305) 539-1304

Mark C. Mao (CA Bar No. 236165)
 mmao@bsflp.com
 Sean Phillips Rodriguez (CA Bar No. 262437)
 srodriguez@bsflp.com
 Beko Reblitz-Richardson (CA Bar No. 238027)
 brichardson@bsflp.com
 44 Montgomery Street, 41st Floor
 San Francisco, CA 94104
 Tel: (415) 293 6858
 Fax: (415) 999 9695

William Christopher Carmody (*pro hac vice*)
 bcarmody@susmangodfrey.com
 Shawn J. Rabin (*pro hac vice*)
 srabin@susmangodfrey.com
 Steven Shepard (*pro hac vice*)
 sshepard@susmangodfrey.com
 Alexander P. Frawley (*pro hac vice*)
 afrawley@susmangodfrey.com
 SUSMAN GODFREY L.L.P.

1 mariehayrapetian@quinnmanuel.com
2 865 S. Figueroa Street, 10th Floor
3 Los Angeles, CA 90017
4 Telephone: (213) 443-3000
5 Facsimile: (213) 443-3100

6 Jomaire A. Crawford (admitted pro hac vice)
7 jomairecrawford@quinnmanuel.com
8 51 Madison Avenue, 22nd Floor
9 New York, NY 10010
10 Telephone: (212) 849-7000
11 Facsimile: (212) 849-7100

12 Josef Ansorge (admitted pro hac vice)
13 josefansorge@quinnmanuel.com
14 Xi ("Tracy") Gao (CA Bar No. 326266)
15 tracygao@quinnmanuel.com
16 Carl Spilly (admitted pro hac vice)
17 carlspilly@quinnmanuel.com
18 1300 I Street NW, Suite 900
19 Washington D.C., 20005
20 Telephone: (202) 538-8000
21 Facsimile: (202) 538-8100

22 Jonathan Tse (CA Bar No. 305468)
23 jonathantse@quinnmanuel.com
24 50 California Street, 22nd Floor
25 San Francisco, CA 94111
26 Telephone: (415) 875-6600
27 Facsimile: (415) 875-6700

28 Attorneys for Defendant

1301 Avenue of the Americas, 32nd Floor
2 New York, NY 10019
3 Tel: (212) 336-8330

4 Amanda Bonn (CA Bar No. 270891)
5 abonn@susmangodfrey.com
6 SUSMAN GODFREY L.L.P.
7 1900 Avenue of the Stars, Suite 1400
8 Los Angeles, CA 90067
9 Tel: (310) 789-3100

10 John A. Yanchunis (*pro hac vice*)
11 jyanchunis@forthepeople.com
12 Ryan J. McGee (*pro hac vice*)
13 rmcgee@forthepeople.com
14 MORGAN & MORGAN, P.A.
15 201 N Franklin Street, 7th Floor
16 Tampa, FL 33602
17 Tel: (813) 223-5505
18 Fax: (813) 222-4736

19 Michael F. Ram (CA Bar No. 104805)
20 mram@forthepeople.com
21 MORGAN & MORGAN, P.A.
22 711 Van Ness Avenue, Suite 500
23 San Francisco, CA 94102
24 Tel: (415) 358-6913

25 Attorneys for Plaintiffs

1 **ATTESTATION OF CONCURRENCE**

2 I am the ECF user whose ID and password are being used to file this Joint Submission.
3 Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has
4 concurred in the filing of this document.

5
6 Dated: December 19, 2022

By: /s/ Andrew H. Schapiro
7 Andrew H. Schapiro

8 *Counsel on behalf of Google LLC*

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

Pursuant to the joint proposal by the Parties, the Court hereby **ORDERS** the schedule below:

Event	Date
Last Day for Depositions	February 17, 2023
Last Day to File Motions for Summary Judgment	To Be Included in January 23, 2023 Joint Scheduling Statement (Previously set deadlines are hereby VACATED)

IT IS SO ORDERED.

DATED: December 19, 2022


HON. YVONNE GONZALEZ ROGERS
United States District Court Judge